



City Neighborhood Council

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Seattle City Council PLUS Committee

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VIA EMAIL

Subject: Recommend No to Separate Transit Communities Comprehensive Plan Policies

The City Neighborhood Council has, for the past several months, been studying the proposed C-6 Transit Communities Policies proposed by the Planning Commission and revised by the Department of Planning and Development. While we support the underlying goals of improving transit service citywide to allow more people to choose transit for their trips, we are not persuaded that it is necessary or even beneficial to approve these proposed Transit Communities policies for the following reasons:

Transit Communities Typologies Don't Meet Any Need

We question the value of creating yet another layer of land use typologies in the Comprehensive Plan. The Transit Communities amendment references the creation of 5 "new" community definitions that will only create confusion because they are so similar to the established hierarchy of urban centers and urban villages which are already characterized by differences in land use, housing and job density potential, and transit access. If the goal is to prioritize city spending on projects to enhance transit use, no new 'typologies' are needed; political choices and funds are needed.

Proposed Transit Communities Policies Are Actually Work Items

The policies identified at LU 270 – LU 274 are actually work items, not policies. These "policies" outline a course of analysis that the Planning Commission wishes to undertake to draw 10-minute walk maps around areas of the city with "frequent" transit service. While this may be a worthy planning exercise (to draw more sophisticated maps) it's not a policy. During the February 12th briefing of the PLUS committee, the past chair of the Planning Commission even made this point asking for an estimated \$500,000 to cover the cost of this analysis.

Lack of Definitions of Qualifying Transit Service

These "policies" or goals don't define the nature or frequency of the underlying transit service needed to support a transit community. While there have been verbal

explanations that frequent means 15 minute headways, 18 hours per day, and that the intent of the policies is to define “centroids” of transit activity and connectivity, the actual policy language falls far short of this clarity. This is a problem because using the loose definition of “transit stations and stops” would encompass most of the city. Does this policy mean that entire corridors could be converted by definition into transit communities merely because a bus route travels through it with some frequency and all land within a 10 minute walk from any bus stop should be considered for increased density? What happens when the transit route or service level is changed? Will the land use designation respond to this reversal? The policies ignore these implications.

Transit Communities Designation Should be Integral to Neighborhood Planning

The Council has recently committed to funding neighborhood plan updates on a regular schedule. If Urban Village boundaries need to be adjusted for some reason related to transit service, or zoning changes need to be considered, it should be done in the context of a neighborhood plan update or creation of a new neighborhood plan for an area not covered by an existing plan. That way all the related factors identified by the Commission as the “essential components of livability” can be taken into practical consideration before defining transit communities.

Transit Community Policies Set Rezones in Motion by Definition

It seems that the purpose of the Transit Communities policy is to elevate transit access above other considerations when establishing rezone criteria which trends away from a recognized need to differentiate between Seattle's distinctive neighborhoods when making land use decisions.

The Planning Commission's brochure entitled “Creating a Citywide Transit Community Strategy” includes a schedule which closely links the adoption of these Transit Communities policies with development of Land Use Code changes by DPD. This linkage was also emphasized by Tom Hauger in a DPD sponsored “Live Chat” about Comprehensive Plan policies on Oct 12, 2012. (Excerpt appended to this letter.)

If the purpose of the Transit Communities policies is to recommend areas to up-zone for dense transit-oriented development, those recommendations should be done in a straightforward way, not hidden within vague policy language about transit service. Without doubt, the broad definitions of Transit Communities will result in its inappropriate application to areas which should not be included. In addition, inclusion of areas within Transit Communities without reference to specific sites will occur without actual notice and public input from the affected areas. Vagueness in the definition of transit service will be exploited by some developers to push for inappropriate contract or legislative rezones. Transit Communities policies, if they are needed, should follow completion of the Buildable Lands Report 2014 Update, not precede it because we don't yet know if Seattle lacks development capacity to meet growth targets.

Do We Have The Space and Financial Resources To Create Transit Communities?

Waiting at any bus stop or one of the new Rapid Ride "stations" downtown during commute hours one quickly realizes that we have effectively maxed out the transit carrying capacity of the bus tunnel, 3rd Avenue and other major transit streets in the Seattle downtown jobs center. Complete transit communities with all the "essential components of livability" sounds a bit utopian without more evidence of how much more transit service will be needed to realize this vision and how we will pay for it. One certain

component of livability is to avoid planning for “crush capacity” transit yet that is already occurring according to the Seattle Transit Master Plan Briefing Book page 4-35 which concludes “Passenger loading issues are significant on a number of corridors, despite peak frequencies of 10 minutes or less...”

Alternative Approach

We recommend postponing the entire Transit Communities policy discussion until the 2015 major revision of the Comprehensive Plan because these policies are intended to have a significant impact on the city's Future Land Use Map as well as setting financial priorities. Further environmental analysis of alternatives to accommodating growth should also be part of the 2015 Comprehensive Plan update. Rather than adopting this policy language now, Council should instead identify and fund specific work items and pose questions to be answered that will shed more light on the consequences of adopting these policies to make a more informed decision in 2015.

As always, the CNC remains interested in working with the City Council and the Planning Commission on Seattle's Comprehensive Plan, and neighborhood/subarea planning to enhance Seattle's livability now and in the future.

Sincerely,



Philip Shack, CNC Chair

C: via email

Tom Hauger, DPD Planner

Barbara Wilson, Planning Commission Director

Peter Harris, Central Staff

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Seattle City Council

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APPENDIX

Excerpt from dialogue on DPD Sponsored “Live Chat” about Comprehensive Plan policies on Oct 12, 2012. (Emphasis in yellow added)

The Comp Plan's strategy of directing new growth to urban villages set out to maintain the existing single-family neighborhoods. The urban villages constitute less than 20% of the city's land area. Since the Plan was adopted, 3/4 of new housing units have gone into the urban villages and urban centers. Policies that the Planning Commission has proposed would treat areas well-served by transit similarly to the urban villages. Further analysis will be needed to see the effect of that policy on the single-family areas. by tom.hauger 1:45 PM

That further analysis should be completed before we change policy language so people understand the implications of the new policy. The loose definition of transit communities could affect many SF and LR zones that do not have updated

n'hood plans. This lack of analysis is a good reason to do a serious SEPA review of growth alternatives that are "desired" under these revised policies. by *Irene* [1:56 PM](#)

That is an insightful comment. Looking more closely at where transit communities would affect existing land use regulations and potential level of growth will be part of the designation process. by *tom.hauger* [2:00 PM](#)

Which comes first, the "designation process" or amending the Comp Plan language? by *Irene* [2:04 PM](#)

The designation process would need to be consistent with the policies in the Comp Plan, so designation would occur either simultaneously with, or after, the adoption of the policies. by *tom.hauger* [2:06 PM](#)